



**Environmental
Liquidating
Trust**

June 19, 2008

WLB
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Mr. William Brattain
California Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

Mr. Ray Leclerc
California Environmental Protection Agency
Department of Toxic Substances Control
8800 Cal Center Drive, 2nd Floor
Sacramento, California 95826-3200

IT Environmental Liquidating Trust – Montezuma Hills Facility
Comments to Tentative Updated Waste Discharge Requirements

Dear Mr. Brattain and Mr. Leclerc,

The IT Environmental Liquidating Trust (ITELT) received the Regional Water Quality Control Board's Tentative Updated Waste Discharge Requirements for the Montezuma Hills Facility dated June 10, 2008.

ITELT is submitting the following comments to be considered and/or incorporated into the tentative Waste Discharge Requirements. In addition, comment #7 below also requires review and/or approval by DTSC.

- 1) Within the Buff sheet, the second sentence should be corrected to read "The facility was formerly owned and operated by IT Corporation until their bankruptcy in 2002. The IT Environmental Liquidating Trust was formed in 2004 to handle the ongoing monitoring and maintenance".
- 2) Within the Buff Sheet, the second paragraph, second to last sentence should be corrected to read "Impacted groundwater is extracted from recovery wells and trenches located on both the inside and outside of the slurry wall..."
- 3) Within the tentative WDR Order, on page 4, Item 25: In second to last sentence, the words "sany silt" should be corrected as "sandy silt".
- 4) Within the tentative WDR Order, on page 16, Item 31: This item should be removed or modified since no LCRS is present for the Montezuma Hills Class 1 Landfill. The Landfill is dewatered by the groundwater trench system.
- 5) Within the tentative WDR Order, on page 16, Item 32: This item should be removed or modified since vadose zone monitoring is not appropriate for the Montezuma Hills Class 1 landfill configuration.
- 6) The Attachment B figure should be modified to correct the dates of the 1990 and 1984 Slurry Walls. The dates should be switched so that the northern slurry wall is 1984 and the southern slurry wall is 1990.
- 7) Within the MRP on page 2 in Section 1. Groundwater Monitoring, third paragraph, last two sentences require that the semi-annual sampling for the upper water-bearing unit is performed in June and December, and the annual sampling for all other wells in June.

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ITELT requests that "June and December" be replaced with "2nd and 4th Quarters" and "June" replaced with "2nd Quarter". Expanding the sampling duration to include the entire 2nd and 4th quarters will provide ITELТ with a more reasonable schedule to complete the sampling project, and to avoid difficult sampling conditions that are encountered at the Montezuma Hills facility (i.e., black knot insect infestation, extremely hot weather, and wet/muddy conditions).

If these changes are approved, some pages in the Sampling and Analysis Plan (submitted with the Post-Closure Permit Application to DTSC) would need minor revisions, which are presented in Attachment 1. The revisions are shaded with strikeout format for your review.

- 8) Within the MRP on page 3, Table 1: the EPA analytical methods for arsenic and selenium should be changed to "6010" in order to be consistent with the current method used at the Montezuma Hills facility.
- 9) Within the MRP on page 8, Annual Monitoring Summary Report, second paragraph, second sentence states: "This information shall be displayed on a water table contour map with groundwater flow directions for each quarter of the reporting year." This sentence should be modified to replace [quarterly] water level contour maps to [annual] water level contour maps. Quarterly frequency of contour maps have previously shown no significant changes in the direction of groundwater flow at the Montezuma Hills facility. Quarterly contour maps would provide no new information and would generate an excessive number of similar figures in the report. The current reports with annual contour maps have been adequate to address the groundwater flow directions at the Montezuma Hills facility. Quarterly water level trends are provided in the water level hydrographs.
- 10) Within the MRP on page 9, Constituents of Concern (COC) 5-Year Report, the second sentence states: "The groundwater monitoring for COC Report shall alternate between the fall and spring seasons." This sentence should be modified or removed since only an annual report is required; and since COCs are sampled for both water bearing units during the annual event in the spring only.

If you have any questions regarding these comments, please contact me at (707) 751-1999.

Sincerely,



Richard R. Swanson, P.G.
Groundwater Programs Manager
IT Environmental Liquidating Trust

Attachment 1: Proposed Sampling and Analysis Plan revisions for pages 5 and 6, and Table 1.